

1 F. Christopher Austin (Nevada Bar No. 6559)

2 [caustin@weidemiller.com](mailto:caustin@weidemiller.com)

3 **WEIDE & MILLER, LTD.**

4 10655 Park Run Drive, Suite 100

5 Las Vegas, NV 89144

6 Telephone: (702) 382-4804

7 Facsimile: (702) 382-4805

8 *Attorney for Evoke Technologies*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 IMAGEKEEPER, LLC, a Nevada limited  
12 liability company;

13 Plaintiff,

14 v.

15 WRIGHT NATIONAL FLOOD INSURANCE  
16 SERVICES, LLC, a Delaware limited liability  
17 Company, and EVOKE TECHNOLOGIES  
18 PRIVATE LIMITED, an Ohio foreign  
19 corporation.

20 Defendant.

Case No.: 2:20-cv-01470-GMN-VCF

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE A  
PROPOSED PROTECTIVE ORDER**

**(First Request)**

21 Pursuant to LR IA 6-1, 6-2, and LR 7-1, Plaintiff IMAGEKEEPER, LLC,  
22 (“ImageKeeper”) and Defendants EVOKE TECHNOLOGIES PRIVATE LIMITED (“Evoke”)  
23 and WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC (“Wright National”), by  
24 and through their respective counsel of record, hereby stipulate and agree to a one-week extension  
25 of time for the Parties to file a Proposed Protective Order. This is the first requested extension.

26 On March 15, 2021 the Court issued a Minutes of Proceedings (ECF 137) indicating that  
27 the deadline to file a final agreed Protective Order is March 18, 2021. In response to this Minute  
28 Order the Parties worked in good faith to reach agreement on the language of a proposed  
protective order. The Parties have reached agreement on all issues except the protocol for  
designees of the respective Parties to access and review the respective confidential source code  
of the Parties. To assist in fashioning such a protocol, the Parties have agreed to consult with  
third-party vendors who provide services purported to securely provide efficient review of such  
confidential source code. However, the Parties have not had time to jointly engage in such

1 consultations prior to the current deadline and are, therefore, requesting an additional week to do  
2 so. Accordingly, the Parties represent there is good cause for the requested extension.

3 THEREFORE, Plaintiff and Defendant hereby stipulate and agree that the deadline to file  
4 a Proposed Protective Order shall be extended to and including Thursday, March 25, 2021.

5 Dated: March 17, 2021.

6 **IMAGEKEEPER**

7 By: /s/ Barrington E. Dyer  
8 Colby B. Springer (*Pro Hac Vice*)  
9 Barrington E. Dyer (*Pro Hac Vice*)  
10 Terih P. Nguyen (*Pro Hac Vice*)  
11 Miya Yusa (*Pro Hac Vice*)  
12 POLSINELLI LLP  
13 Three Embarcadero Center, Suite 2400  
14 San Francisco, CA 94111  
15 [cspringer@polsinelli.com](mailto:cspringer@polsinelli.com)  
16 [bdyer@polsinelli.com](mailto:bdyer@polsinelli.com)  
17 [thpnguyen@polsinelli.com](mailto:thpnguyen@polsinelli.com)  
18 [myusa@polsinelli.com](mailto:myusa@polsinelli.com)

19 H. Stan Johnson, Esq.  
20 Steven B. Cohen, Esq.  
21 COHEN JOHNSON LLC  
22 375 E. Warm Springs Road, Suite 104  
23 Las Vegas, NV 89119  
24 [sjohnson@cohenjohnson.com](mailto:sjohnson@cohenjohnson.com)  
25 [scohen@cohenjohnson.com](mailto:scohen@cohenjohnson.com)  
26 *Attorneys for Plaintiff ImageKeeper, LLC*

27 **WRIGHT NATIONAL FLOOD**

28 /s/ Terry W. Ahearn  
Terry W. Ahearn (*Pro Hac Vice*)  
D. Stuart Bartow (*Pro Hac Vice*)  
DUANE MORRIS LLC  
2475 Hanover Street  
Palo Alto, CA 94304-1194  
[twahearn@duanemorris.com](mailto:twahearn@duanemorris.com)  
[dsbartow@duanemorris.com](mailto:dsbartow@duanemorris.com)

Dominica C. Anderson (SBN 2988)  
Daniel B. Heidtke (SBN 12975)  
100 N. City Parkway, Suite 1560  
Las Vegas, NV 89106-4617  
[dcanderson@duanemorris.com](mailto:dcanderson@duanemorris.com)  
[dbheidtke@duanemorris.com](mailto:dbheidtke@duanemorris.com)

*Attorneys for Defendant Wright National  
Flood Insurance Services, LLC*

**EVOKE TECHNOLOGIES**

By: /s/ F. Christopher Austin  
F. Christopher Austin (SBN 6559)  
WEIDE & MILLER, LTD.  
10655 Park Run Drive, Suite 100  
Las Vegas, NV 89144  
[caustin@weidemiller.com](mailto:caustin@weidemiller.com)

Donald L. Prunty (SBN 8230)  
Bethany L. Rabe (SBN 11691)  
GREENBERG TRAURIG, LLP  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, NV 89135  
[pruntyd@gtlaw.com](mailto:pruntyd@gtlaw.com)  
[rabebl@gtlaw.com](mailto:rabebl@gtlaw.com)

*Attorneys for Defendant Evoke Technologies  
Private Limited*

**IT IS SO ORDERED.**

UNITED STATES MAGISTRATE JUDGE

DATED: 3-18-2021